

REMARKS

Claim 18 has been amended to clarify to language.

No amendment made is related to the statutory requirements of patentability unless expressly stated herein. No amendment is made for the purpose of narrowing the scope of any claim, unless Applicant had argued herein that such amendment is made to distinguish over a particular reference or combination of references. Any remarks made herein with respect to a given claim or amendment is intended only in the context of that specific claim or amendment, and should not be applied to other claims, amendments, or aspects of Applicant's invention.

Rejection of Claim 18 under 35 U.S.C. § 112, second paragraph

Claim 18 has been amended to remedy the objection under 35 U.S.C. § 112, second paragraph. Applicant submits that Claim 18 as amended overcomes this rejection. Accordingly, Applicant respectfully requests the rejection be withdrawn.

Rejection of Claims 1, 5 – 10, and 25 – 29 under 35 U.S.C. § 103 (a) as being unpatentable over US 7155683 (Williams) in view of US 6310634 (Bodnar)

Applicant respectfully traverses the rejection. Applicant respectfully submits that Williams and Bodnar, individually or in combination, fail to teach or suggest all the claim limitations as set forth in independent claims 1 and 25.

Independent claim 1 provides, *inter alia*, "receiving a second input, said second input being either a second key corresponding to a second set of textual character...adding a second completion alternative for said second input being said second key, said second completion alternative being either a most probable combination of said most probable first character selected from said first set of textual characters and a most probable second character selected from said second set of textual characters, or a most probable second sub-string, said second sub-string beginning with said most probable first character and said most probable second character and including at least a most probable third character". Thus, the second input includes a second key corresponding to a second set of textual characters that adds a second completion alternative for the second key. Stated another way, the second input key provides the second completion

alternative for the second set of textual characters.

In contrast, Williams at col. 6 describes that, when typing the first few letters of a word, the predictive editor program is not yet able to display the intended characters and may erroneously display an unintended string of characters as merely temporary characters on the display while predictive editor program is evolving a match. When continuing to type the remaining characters in the word, the displayed characters become more accurate. No matter what is shown by the display, the user simply types the next character in the desired word. As long as a word is being entered, the already entered word remains underlined. The user in this case accepts the word by pressing the space key.

Williams at col. 7, lines 44 - col. 8 line 14 describes that the user of the device gets an option to toggle through other choices of the same key combination using the "*" option. Williams clearly describes that the key sequence typed by the user allows several words. In this case, the predictive editor program first suggests the two most common words from the core directory. Thereafter, all whole word matches from the user directory and core directory are shown. The "*" key gives the user the option to go to the next possible match for the key sequence. However, Williams fails to describe a second input that includes a second key corresponding to a second set of textual characters that adds a second completion alternative for the second key.

For Williams, alternatives for the entered key strokes are provided using the "*" key and selecting the alternative using the space key. However, Williams fails to describe the second input key corresponding to a second completion alternative, where the second completion alternative is either the most probable combination of the most probable first character selected from selected from the first set of textual characters and a most probable second character selected from the second set of textual characters or a most probable second sub-string.

Williams merely describes that the alternative match replaces the active underlined word in the text; however does not describe that the second input key provides the second completion alternative for the second set of textual characters.

Therefore, Williams fails to describe "receiving a second input, said second input being either a second key corresponding to a second set of textual character...adding a second completion alternative for said second input being said second key, said second completion

alternative being either a most probable combination of said most probable first character selected from said first set of textual characters and a most probable second character selected from said second set of textual characters, or a most probable second sub-string, said second sub-string beginning with said most probable first character and said most probable second character and including at least a most probable third character", as recited by Applicant's independent claim 1.

Bodnar does not describe or suggest any type of second input including a second key corresponding to a second set of textual characters that adds a second completion alternative for the second key, nor any type of second input key providing a second completion alternative for a second set of textual characters, as required by independent claim 1.

Applicant respectfully submits that the above discussed arguments equally apply to the claim limitations of independent claim 25.

In view of the foregoing, Applicant respectfully submits that Williams and Bodnar, individually or in combination, fail to teach or suggest the claim limitations as set forth in independent claims 1 and 25. Since the combination of Williams and Bodnar fails to disclose Applicant's claimed invention as claimed in independent claims 1 and 25, Applicant respectfully requests withdrawal of the rejection of Claims 1 and 25 under 35 USC 103(a).

Dependent claims 5 – 10 and 26 – 29 depend from, and include all the limitations of the independent claims 1 and 25. Therefore, Applicant respectfully requests the reconsideration of dependent claim 5 – 10 and 26 – 29 and requests withdrawal of the rejection.

Rejection of Claims 11 and 16 - 20 under 35 U.S.C. § 103 (a) as being unpatentable over US 7155683 (Williams) in view of US 6310634 (Bodnar) and further in view of US 2004/0153963 (Simpson)

Dependent claims 11 and 16 – 20 depend from, and include all the limitations of the independent claim 1. Therefore, Applicant respectfully requests the reconsideration of dependent claim 11 and 16 – 20 and requests withdrawal of the rejection.

CONCLUSION

Applicant respectfully requests that a timely Notice of Allowance be issued in this case. Such action is earnestly solicited by the Applicant. Should the Examiner have any questions, comments, or suggestions, the Examiner is invited to contact the Applicant's attorney or agent at the telephone number indicated below.

Please charge any fees that may be due to Deposit Account 502117, Motorola, Inc.

Respectfully submitted,
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